



January 6, 2009

L. Nelson Roberts, Jr.
SCDHEC – BAQ
2600 Bull Street
Columbia, SC 29201

Dear Mr. Roberts:

Catawba Regional Council of Governments (CRCOG), which serves Chester, Lancaster, Union and York Counties, would like to take this opportunity to offer comments regarding the Environmental Protection Agency's (EPA) draft guidance setting of eight-hour ozone non-attainment boundaries.

It is our understanding that the Governor's office will propose the boundaries for the ozone non-attainment regions to the EPA in March 2009 based on data provided by SCDHEC. The following comments are provided to assist DHEC in making this recommendation:

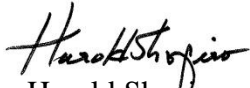
- We encourage DHEC to make all efforts to assure that the Governor's recommendation for ozone attainment or nonattainment include data from the 2009 ozone season.
- Catawba Regional COG strongly supports the proposal of SCDHEC to present data supporting reduction of EPA's default statistical areas. This includes the proposal to petition the EPA to keep the boundary contained within eastern York County. This comment is in accordance with action taken by the RFATS MPO.
- No air quality monitors exist in Chester, Lancaster, or Union Counties. Consequently, no statistical data exists to use as a basis for concluding that air quality within these counties fails to meet federal standards.
- Chester, Lancaster, and Union Counties should not be included within nonattainment boundaries simply because of their inclusion in Micropolitan Core Based Statistical Areas. We believe that the more appropriate nonattainment boundary would be much smaller than the CBSA.
- Chester, Lancaster, and Union Counties are predominantly rural counties.
- One major highway, Interstate 77, runs through Chester County. No interstate is in or near Union County. Therefore, traffic volumes are minor and do not significantly contribute to vehicular emissions.

- No concentrations of industrial emission sources exist in Chester, Lancaster or Union Counties.
- Counties in the Catawba Region have experienced significant loss of jobs resulting in fewer industrial emissions as well as vehicular emissions.

Catawba Regional COG believes that the information cited above provides ample justification for modifying EPA's presumptive boundary proposal.

We greatly appreciate the opportunity to provide comments on this issue.

Sincerely,

A handwritten signature in black ink, appearing to read "Harold Shapiro", written in a cursive style.

Harold Shapiro
Executive Director

cc: Dora Martin
James Baker
Donnie Betenbaugh
Carlisle Roddey
Carey Smith
Steve Willis
Frances Thomas